



July 17, 2023

VIA ECF

The Honorable Sarah J. Netburn  
United States Magistrate Judge  
U.S. District Court for the Southern District of New York  
Thurgood Marshall U.S. Courthouse, Room 430  
40 Foley Square  
New York, New York 10007

*In re Terrorist Attacks on September 11, 2001*, Case No. 1:03-md-1570-GBD-SN (S.D.N.Y.)

Dear Judge Netburn:

In accordance with this Court's Orders entered June 28, 2023 (ECF No. 9171) and July 11, 2023 (ECF No. 9210), Al Rajhi Bank and Plaintiffs with claims against the Bank write to jointly update the Court on their meet-and-confer discussions and their proposed schedule for the remainder of limited jurisdictional discovery.

**1. Remaining Schedule for Jurisdictional Fact and Expert Discovery**

The Parties are in agreement on a modified schedule for completion of jurisdictional fact and expert discovery. The Parties agree as follows:

- Fact discovery in accordance with this Court's July 11, 2023 Order (ECF No. 9210) shall be completed by September 1, 2023.
- Plaintiffs shall serve their expert disclosures and affirmative reports by October 4, 2023.
- The Bank shall serve its expert disclosures and rebuttal reports by November 22, 2023.
- Expert discovery shall be completed by December 20, 2023.
- Plaintiffs shall submit a statement of the facts and evidence on which they will rely in meeting their burden to establish personal jurisdiction over the Bank, in accordance with this Court's May 9, 2023 Order (ECF No. 9077), by January 19, 2024.

The Parties reserve all rights including with respect to any objections to the July 11, 2023 Order.

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**2. Al Rajhi Bank's Motion to Compel**

The Parties continue to meet and confer on the Bank's Motion to Compel (ECF No. 9002), and propose that the Parties file a joint letter to the Court outlining any remaining disputes by Friday, July 21, 2023.

Respectfully submitted,

*/s/ Nicole Erb*

Christopher M. Curran  
Nicole Erb  
Reuben J. Sequeira  
Michael Mahaffey  
*Counsel for Al Rajhi Bank*

The parties' request is GRANTED. Jurisdictional discovery shall proceed on the schedule outlined in this letter. The parties will submit a joint letter discussing outstanding disputes with respect to Al Rajhi Bank's Motion to Compel by July 21, 2023.

**SO ORDERED.**

  
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SARAH NETBURN  
United States Magistrate Judge

Dated: July 18, 2023  
New York, New York